

United States Bankruptcy Court  
Eastern District of Virginia  
Alexandria Division

In re:

Terence Michael Hynes,  
Kathryn Wilson Hynes,  
  
Debtor.

Case No. **16-10556-BFK**

Chapter 11

**Hearing May 3, 2016, at 11:00 am  
Courtroom III, 3<sup>rd</sup> Floor**

**Notice of Motion and Notice of Hearing**

The United States Trustee has filed papers with the Court to have the Court set a date certain for the filing of a disclosure statement and plan of reorganization by the Debtors, and for the Debtors to submit and the Court approve a budget for the Debtors' expenses.

A hearing on the motion will be held:

<b>Place:</b>	<b>Date and Time:</b>
Martin V.B. Bostetter, Jr. United States Courthouse United States Bankruptcy Court Courtroom No. III, Third Floor 200 South Washington Street Alexandria, Virginia 22314	Tuesday, May 3, 2016 at 11:00 am

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not wish the Court to grant the relief sought in the motion, or if you want the Court to consider your views on the motion, then on or before five days before the scheduled hearing date, you or your attorney must:

- File with the Court a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). **Unless a written response and supporting memorandum are filed and served by the date specified, the**

Office of the United States Trustee  
115 South Union Street  
Alexandria, Virginia 22314  
(703) 557-7229

**Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing.** If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above. You must **also** mail a copy to the persons listed below.

- Attend the hearing.

**If no timely response has been filed opposing the relief requested, the Court may grant the relief without holding a hearing.**

- A copy of any written response must be mailed to the following persons:

United States Trustee  
115 South Union St, Suite 210  
Alexandria, VA 22314

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and enter an order granting that relief.

Judy A. Robbins,  
United States Trustee,

/s/ Jack Frankel  
Jack Frankel, Attorney  
Office of United States Trustee  
115 S Union Street  
Alexandria, VA 22314  
(703) 557-7229

### Certificate of Service

I hereby certify that on the 4<sup>th</sup> day of April, 2016, I mailed, United States mail, postage prepaid, first class, a copy of this motion and notice of motion and hearing to:

<b>Brian Andrew Tucci, Esq.</b> Goren &Tucci, LLC 7979 Old Georgetown Road, Suite 750 Bethesda, MD 20814	<b>Terence Michael Hynes</b> <b>Kathryn Wilson Hynes</b> 7004 Green Oak Drive Mc Lean, VA 22101-1551
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/s/ Jack Frankel